Application No. 10/008,732
Amendment dated March 20, 2006
Response to Office Action of November 18, 2005

Atty. Docket No. 42390.P12567
Examiner Dang, Thanh Ha T.
TC/A.U. 2163

Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1 and 21 have been amended. Claims 11-20 and 27-30 were previously canceled. No claims have been added. Thus, claims 1-10 and 21-26 are pending.

CLAIM REJECTION – 35 U.S.C. § 102(e)

Claims 1-10 and 21-26 were rejected as being anticipated by U.S. Patent No. 6,584,459 issued to Chang, et al. (*Chang*). For at least the reasons set forth below, Applicants submit that claims 1-10 and 21-26 are not anticipated by *Chang*.

Claim 1 recites:

> designating tags that specify data semantics to identify tables and/or attributes to be used in storing information in a text file using a relational database model;
> storing the text file with the tags in a memory device; and
> accessing the stored text file as a relational database via a programming interface that includes a procedure call format representing a declarative statement.

Thus, Applicants claim designating tags that specify semantics to identify tables and/or attributes. Further, Applicants claim accessing a text file stored with the tags as a relational database via a programming interface using a declarative statement.

Chang discloses a XML extension to a relational database. See col. 3, lines 48-51. The extension allows search and retrieval of XML documents through the database. See col. 3, lines 56-58. That is, the XML documents are stored *in* a relational database. See col. 3, lines 62-63. The XML file (or any other type of file) is not accessed as a

relational database as recited in claim 1. Therefore, *Chang* cannot anticipate the

invention as claimed in claim 1.

Claims 2-10 depend from claim 1. Because dependent claims include the

limitations of the claims from which they depend, Applicants submit that claims 2-10 are

not anticipated by *Chang* for at least the reasons set forth above.

Claim 21 recites:

> making information stored in a memory device as a text file
> comprising tags specifying data semantics corresponding to a relational
> database model available through a procedure call interface;
> receiving from an application a relational database request using
> the procedure call interface;
> accessing the stored text file in response to the request as a
> relational database via a programming interface that includes a procedure
> call format representing a declarative statement; and
> returning data from the text file corresponding to the relational
> database request.

Thus, Applicants claim making data in a text file available as a relational database.

As discussed above, Chang does not disclose accessing a text file as a relational

database. Therefore, Chang cannot anticipate the invention as claimed in claim 21.

Claims 22-26 depend from claim 21. Because dependent claims include the limitations

of the claims from which they depend, Applicants submit that claims 22-26 are not

anticipated by *Chang* for at least the reasons set forth above.

CONCLUSION

The Examiner is respectfully requested to contact the undersigned by telephone if

such contact would further the examination of the present application. Please charge any

shortages and credit any overcharges to our Deposit Account number 02-2666.
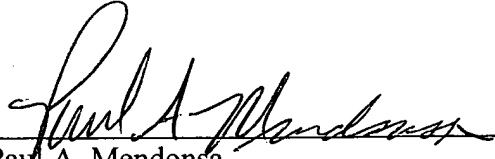
Respectfully submitted,

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BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP

Date: March 20, 2006

Paul A. Mendonsa
Attorney for Applicant
Reg. No. 42,879

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(503) 439-8778